

EXHIBIT B

From: [London, Sarah R.](#)
To: [Smith, Kyle](#); [Marlene Goldenberg](#)
Cc: [Keller, Andrea M](#); [Luskey, Randy](#); [Atkins, Robert A](#); [Clague, Ronan](#); [Woods, Caitlin M.](#); [Kawamura, Jennifer](#); [Phillips, Jessica E](#); [Roopal Luhana](#); [Rachel Abrams](#); [Tipton, Alex](#); [Svistovski, France](#)
Subject: RE: [EXT] RE: Uber productions -- URGENT
Date: Thursday, February 8, 2024 1:10:03 PM

Hi all, wanted to follow up and confirm what we discussed yesterday.

1. Plaintiffs intend to file a motion to enforce PTO 5 as outlined below on Friday, February 9 and also file a motion to shorten time.
2. We asked that you provide or confirm before then the following:
 - a. Provide a list of all government investigations or inquiries within the United States of Uber with respect to sexual assault, including attempted assaults
 - i. Upon receipt, we will identify any investigations or inquiries we believe are missing from your list
 - b. Confirm whether documents were produced in connection with each of these inquiries or investigations
 - c. Confirm that you have produced all documents Uber produced to the CPUC in connection with its investigation or inquiry with respect to sexual assault, including attempted assaults
 - i. IF not, please confirm whether you will do so, and if so, when.
 - d. Confirm that you have produced all documents Uber produced to Congress (including any individual member) in connection with its investigation or inquiry with respect to sexual assault, including attempted assaults
 - i. IF not, please confirm whether you will do so, and if so, when.
3. We also asked you to stipulate to a briefing schedule that would tee up this issue with Judge Cisneros for her 2/22 hearing.

We look forward to your urgent attention to this issue.

**Lieff
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& Bernstein**
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From: Smith, Kyle <ksmith@paulweiss.com>
Sent: Wednesday, February 7, 2024 11:35 AM
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